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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

**LOUJAIN HATHLOUL  
ALHATHLOUL,**

Plaintiff,

vs.

**DARKMATTER GROUP, MARC  
BAIER, RYAN ADAMS, AND DANIEL  
GERICKE,**

Defendants.

No. 3:21-cv-01787-IM

**JOINT UNOPPOSED MOTION FOR  
EXTENSION OF TIME FOR  
DEFENDANTS DARKMATTER GROUP,  
MARC BAIER, RYAN ADAMS, AND  
DANIEL GERICKE TO RESPOND TO  
PLAINTIFF'S MOTION FOR LIMITED  
JURISDICTIONAL DISCOVERY AND TO  
HOLD IN ABEYANCE DEFENDANTS'  
JOINT MOTION TO DISMISS (ECF 76)**

### LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Defendant DarkMatter and counsel for the Individual Defendants have conferred with Plaintiff's counsel, and Plaintiff does not oppose this motion.

### JOINT MOTION

Defendants DarkMatter Group ("DarkMatter"), Marc Baier, Ryan Adams, and Daniel Gericke, ("Individual Defendants," and collectively, "Defendants") by and through their undersigned counsel, hereby submit this Joint Unopposed Motion for Extension of Time to Respond to Plaintiff's Limited Motion for Jurisdictional Discovery and to Hold in Abeyance Defendants' Joint Motion to Dismiss (ECF 76.) Defendants seek an extension of 14 days to respond to Plaintiff's Motion—until January 23, 2024.

Defendants request this brief extension because Plaintiff filed her motion over the Christmas holidays, on December 26, and Defendants' response is currently due on January 9, 2024. Due to the holiday season, many of the counsel for Defendants are out of the office on vacation and are unable to sufficiently respond in that short amount of time.

Good cause exists and Defendants respectfully request that the Court grant this unopposed motion to extend the time by 14 days—until January 23, 2024—for Defendants DarkMatter, Marc Baier, Ryan Adams, and Daniel Gericke to respond to Plaintiff's Motion. This request is made in good faith and not for purposes of delay.

Dated this 26<sup>th</sup> day of December, 2023.

Respectfully submitted,

SNELL & WILMER L.L.P.

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